

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

TIMOTHY BRENNAN,

Plaintiff,

vs.

**ARLINGTON COUNTY,
ARLINGTON POLICE
DEPARTMENT, CITY OF
PITTSBURGH, PITTSBURGH
POLICE DEPARTMENT,
JAMES D. CASSEDY, his
individual and official capacity
as Captain of Arlington Police
Department,**

Defendants,

Electronic filing

NO. 2:17cv1309

**TYPE OF PLEADING:
Response to Rule to Show Cause**

**FILED ON BEHALF OF:
Plaintiff**

COUNSEL OF RECORD:

**James R. Jeffries, Esquire
Pa I.D. 89093**

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JURY TRIAL DEMANDED

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

TIMOTHY BRENNAN,
Plaintiff,

No. 2:17cv1309

vs.

**ARLINGTON COUNTY, ARLINGTON
POLICE DEPARTMENT, CITY OF
PITTSBURGH, PITTSBURGH POLICE
DEPARTMENT, JAMES D. CASSEDY, in
his individual and official capacity as
Captain of Arlington Police Department,**

Defendants,

RESPONSE TO RULE TO SHOW CAUSE

AND NOW, comes the Plaintiff, Timothy Brennan, by and through his counsel, James R. Jeffries, Esquire, and the law firm of DeRiso DeRiso Suher & Jeffries, and files the within Response to Rule to Show Cause, and avers as follows:

1. This matter arises out of a Civil claim at the above captioned Docket and Term.
2. The reason for the lack of movement on this matter is simply a lack of service of process.
3. The City of Pittsburgh Defendants have agreed to accept service of process, however, the Defendants in Virginia (Arlington County, Arlington Police Department and James D. Cassedy) indicated through their counsel, that they will not accept service without the same being personal in Virginia.
4. The Plaintiff respectfully requests this Honorable Court to grant an extension of thirty (30) days to effectuate personal service in Virginia upon the above mentioned Virginia Defendants.

5. The Plaintiff's position is simple and straight forward and does not wish to provide any excuses other than the service issue.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court issue an Order granting an extension of thirty (30) days with which to effectuate personal service upon the Virginia Defendants.

Date: May 31, 2018

Respectfully Submitted,

/s/ James R. Jeffries

James R. Jeffries, Attorney for Plaintiff,
Timothy Brennan